

Verification

Kentucky Department of Education



What is Verification?

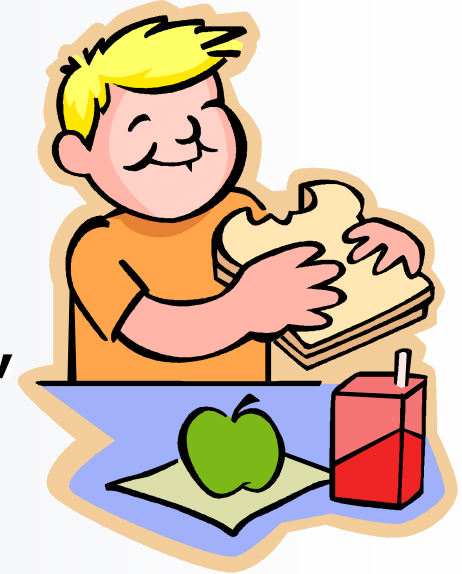
Verification means confirmation of eligibility for free or reduced price benefits under the NSLP or SBP.

Verification shall include confirmation of income eligibility and may also include confirmation of any other information required in the application which is defined as documentation.

Verification may be accomplished by examining information provided by the households such as pay stubs, etc. However, if a food stamp or TANF case number is provided for a child, verification for such child shall only include confirmation that the child is included in a currently certified food stamp or TANF household.

Eligibility Guidance for School Meals

- January 2008
- Reflects changes from:
 - Reauthorization of 2004,
 - Final and interim regulations,
 - Policy clarifications.
- www.fns.usda.gov/cnd



Verification



vs.



Verification for Cause

Verification for Cause

- Verification for Cause can not delay approval of an application.
- Must send a verification letter; may be sent at same time as eligibility notification.
- “Once households have been requested to provide documentation for cause, the LEA must complete the verification process for these households.”
- Do not include applications selected for Verification for Cause in the verification report (FNS-742).

- Refer to page 67

Verification Facts

- Must use the ***Standard Sample Size**** Verification Plan.
- Must complete verification by November 15th .
- Must complete Verification Report to NHS by March 1st.

Verification Process

I. Determine type of verification

II. Select Applications for Verification

III. Conduct Confirmation Review (Replacement Applications)

IV. Household Notification

V. Conduct Verification

VI. Verification Results

VII. Verification Report to SA (742)

Verification - Types

*Basic

■ Standard Sample Size* Verification Plan

- Determine the total number of approved applications on file as of October 1st.

IS LESSOR OF

- 3% of all applications approved by the LEA selected from error prone applications

OR

- 3,000 error prone applications
- Refer to page 68

Standard Sample Size

- 900 total applications:
 - 600 income applications
 - 300 Food Stamp/TANF/KTAP applications
- $900 \times .03 = 27$
- $27 < 3,000$
- 27 “error prone” applications to Verify
 - Refer to page 68

Verification - Types

*Alternate-
Random

■ Alternate One*

- Determine the total number of approved applications on file as of October 1st.

IS LESSOR OF

- 3,000 of all applications selected at random

OR

- 3% of all applications selected at random

Alternate 1 Sample Size

- 900 total applications:
 - 600 income applications
 - 300 Food Stamp/TANF/KTAP applications
- $900 \times .03 = 27$
- $27 < 3,000$
- 27 “random” applications to Verify
 - Refer to page 68

Verification - Types

*Alternate-Focused

■ Alternate Two*

- Determine the total number of approved applications on file as of October 1st.

IS LESSOR OF

- The sum of 1,000 of all applications selected from error prone applications

OR

- 1% of all applications approved selected from error prone applications

Verification - Types

- Alternate Two continued
PLUS THE LESSOR OF
 - 500 applications that provided a case number in lieu of income**OR**
 - One-half (1/2) of one (1)% that provided a case number in lieu of income
 - Refer to page 68

Alternate 2 Sample Size

- 900 total applications:
 - 600 income applications
 - 300 Food Stamp/TANF/KTAP applications
- $900 \times .01 = 9$
- $9 < 1,000$
- $300 \times .005 = 1.5 = 2$ (round up to whole number)
- $2 < 500$
- 9 “error prone” applications and 2 Food Stamp/TANF/KTAP applications to verify
 - Refer to page 68

Verification - Types

- Two ways to annually qualify for alternate sample size
 - **Lowered non-response rate – all LEAs**
 - Non-response rate for the preceding school year is less than 20%
 - Example: 2008-2009, the sponsor may elect to use one of the alternate sample sizes because in 2007-2008, non-response rate was 18%
 - Refer to page 69

Verification - Types

- Two ways to annually qualify for alternate sample size
 - **Improved non-response rate – LEAs with more than 20,000 children approved free or reduced-price by applications**
 - Improved non-response rate for the preceding school year is at least 10% below the non-response rate for the second preceding school year

Verification - Types

Improved non-response rate

- Example: 2006-2007, sponsor has a non-response rate of 25%
- $25\% \times 10\% = 2.5\%$
- $25\% - 2.5\% = 22.5\%$
- 2007-2008, non-response rate was 22.2%, this was more than a 10% improvement
- School year 2008-2009, may choose to use one of the alternative sample sizes

Verification - Types

- Example –

06-07 compared to 07-08 08-09	07-08 compared to 08-09 09-10
08-09 compared to 09-10 10-11	09-10 compared to 10-11 11-12

Selecting Applications

Appendix F

Sample Size Chart

Sample Size Option	Why random sampling is required	How to apply random sampling technique
Standard	Number of error prone applications exceeds required sample	Divide total number of error prone applications by the required sample size
Standard	Number of error prone applications is less than required sample	Divide total number of non-error prone applications by the number of applications need to complete the sample size
Alternate 1	Alternate 1 only uses randomly selected applications	Divide the total number of applications on file on October 1 by the number of applications required for the sample size.
Alternate 2	Number of error prone applications or case number applications exceed required sample	Divide total number of error prone applications OR the total number of case number applications by the required sample size
Alternate 2	Number of error prone applications or case number applications is less than required sample	Divide total number of non-error prone/non-case number applications by the number of applications need to complete the sample size

- Refer to Appendix F; page 107

Selecting Applications

- Example – using our previous **Standard Sample Size** example:

If you have more than 27 income applications that are within the previous guidelines (e.g., are within the \$1,200 per year, etc.), randomly select 27 to verify.

If you do not have 27 applications, verify those that you do have plus randomly select other household applications to complete the sample size. This would include income and case number applications.

Selecting Applications

- From the income group, select the number of required applications for households that report income within:
 - \$1,200/year
 - \$100/month
 - \$50/twice per month
 - \$46.15/bi-weekly
 - \$23.08/weekly

**These are
“error prone”
income
applications.**

Selecting Applications

- With the exception of verification for cause, LEAs must not verify more than or less than the standard sample size or the alternate sample size (when used) and must not verify all (100% of) applications.
 - Refer to page 66

Confirmation Review

- A sponsor official other than the official who made the initial determination must review each approved application selected for verification to ensure the initial determination was accurate.
- Not required if at time of initial approval of applications has a second party check for accuracy.

Confirmation Review

- Reduced-price to free
 - Increase benefits immediately
 - Notify household
 - Include application in verification selection pool
- Free to reduced-price
 - No change in benefits
 - Do not notify families
 - Include application in verification selection pool

Confirmation Review

- Free or reduced-price to paid
 - Send notice of adverse action
 - Do not verify application
 - Replace application with similar application
- After confirmation review is over, the LEA can replace up to 5% of applications.
- Refer to page 71

Household Notification

DOCUMENT

You must notify selected households that their household has been selected for verification.

Must provide a no cost telephone number. This could be a toll free number or a reverse charge statement (collect call).

You must notify households of verification results including rights to appeal.

Conducting Verification

- You must conduct verification.
 - Sources of verification
 - Acceptable documentation of income or receipt of assistance may be provided for any point of time between the month prior to application and the time the household is required to provide income documentation.
- Refer to pages 73-74

Conducting Verification

- Household indicates no income.
 - The sponsor **must** request an explanation of how living expenses are met and may request additional written documentation or collateral contacts.

Conducting Verification

- Household does not respond
 - Sponsor must make at least one follow up attempt.
 - Attempt may be in writing, including e-mail, or by phone.
 - Refer to pages 75-76

Verification Results

- Reduced or terminated benefits households must be given 10 calendar days written advance notice.
 - First day of advance notice is day sent.
 - Must include appeal rights.
 - Must include reason.

Verification Reporting

[INSERT STATE AGENCY NAME]			FORM APPROVED OMB # 0584 -0026			
SCHOOL FOOD AUTHORITY VERIFICATION SUMMARY REPORT			SFA ID #			
			SFA NAME			
			TYPE OF SFA	<input type="checkbox"/> Public <input type="checkbox"/> Private		
			SCHOOL YEAR	-		
<p>According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it contains a valid OMB control number. The valid OMB control number for this collection is 0584-0026. The time required to complete this information collection is 6 minutes per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection.</p>						
I. Enrollment, Application, and Eligibility Information (Pre Verification)			II. Results of Verification, by Application Type			
1. Type of Free/Reduced Price Application Used <input type="checkbox"/> Individual Student <input type="checkbox"/> Household <input type="checkbox"/> Both			6. Type of Verification Used <input type="checkbox"/> Random <input type="checkbox"/> Focused <input type="checkbox"/> All Applications			
<i>Report items 2 through 5 as of the last operating day in October</i>	A. All Schools	B. Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR	<i>Items 7 through 11 are required and are reported as of the date of completion of the verification process (see instructions). Item 12 is optional and is reported as of February 15.</i>	A. FREE ELIGIBLE based on FS/TANF/FDPIR Application (Categorically Eligible)	B. FREE ELIGIBLE based on Income/Household Size Application (Income Eligible)	C. REDUCED PRICE ELIGIBLE
2. Number of schools and RCCIs operating the NSLP and/or SBP						
3. Number of enrolled students with access to the NSLP (or SBP for SBP only schools)						
	A. # of Students	B. # of Approved Applications	7. No Change	# applications		
4. Total FREE ELIGIBLE reported				# students		
4-1. # approved as FREE ELIGIBLE who are not subject to verification (directly certified, homeless liaison list, income- eligible Head start, pre-K Even start, residential students in RCCIs, non-applicants approved by local officials)			8. Responded, Changed to Free	# applications		
				# students		
4-2. # approved as FREE ELIGIBLE based on FS/TANF/FDPIR case number submitted on an application (Categorically Eligible)			9. Responded, Changed to Reduced Price	# applications		
				# students		
4-3. # approved as FREE ELIGIBLE based on income/household size information submitted on an application			10. Responded, Changed to Paid	# applications		
				# students		
4-4. # FREE ELIGIBLES reported for Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR			11. Did Not Respond	# applications		
				# students		
5. Total REDUCED PRICE ELIGIBLE reported			12. Reapplied and Reapproved on or Before Feb. 15	# applications		
5-1. # reduced price eligibles reported for Provision 2/3 schools WHICH ARE NOT OPERATING A BASE YEAR				# students		

Form FNS - 742 (February 2004)

Verification Reporting

- Form FNS – 742

Timeline:

October 1 - Sections 1-6

November 15 - Sections 7-11

February 15 - Section 12

– Completed form sent to NHS by **March 1**

Verification Reporting

I. Enrollment, Application, and Eligibility Information (Pre Verification)		
1. Type of Free/Reduced Price Application Used <input type="checkbox"/> Individual Student <input type="checkbox"/> Household <input type="checkbox"/> Both		
<i>Report items 2 through 5 as of the last operating day in October</i>	A. All Schools	B. Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR
2. Number of schools and RCCIs operating the NSLP and/or SBP		
3. Number of enrolled students with access to the NSLP (or SBP for SBP only schools)		
	A. # of Students	B. # of Approved Applications
4. Total FREE ELIGIBLE reported		
4-1. # approved as FREE ELIGIBLE who are not subject to verification (directly certified, homeless liaison list, income- eligible Head start, pre-K Even start, residential students in RCCIs, non-applicants approved by local officials)		
4-2. # approved as FREE ELIGIBLE based on FS/TANF/FDPIR case number submitted on an application (Categorically Eligible)		
4-3. # approved as FREE ELIGIBLE based on income/household size information submitted on an application		
4-4. # FREE ELIGIBLES reported for Provision 2/3 Schools WHICH ARE NOT OPERATING A BASE YEAR		
5. Total REDUCED PRICE ELIGIBLE reported		
5-1. # reduced price eligibles reported for Provision 2/3 schools WHICH ARE NOT OPERATING A BASE YEAR		

1. Must choose household

2. Enter the number of schools

3. Enter enrollment

4. Enter total free eligible

4-1. Enter number of free eligible who are not subject to Verification

4-2. Enter number of free eligible based on FS/TANF/KTAP

4-3. Enter number free based on income

4-4. Enter number free on non-base year of Provision 2/3

5. Enter total reduced eligibles

5-1. Enter number reduced on non-base year of provision 2/3

Verification Reporting

6. Enter type of Verification

7. Enter number of applications and students whose eligibility did not change due to verification.

8. Enter number of applications and students who changed to free.

9. Enter number of applications and students who changed to reduced price.

10. Enter number of applications and students who changed to paid.

11. Enter number of applications and students who did not respond.

12. Enter number of applications and students who reapplied and were reapproved before 2/15.

II. Results of Verification, by Application Type				
6. Type of Verification Used				
<input type="checkbox"/> Random <input type="checkbox"/> Focused <input type="checkbox"/> All Applications				
<i>Items 7 through 11 are required and are reported as of the date of completion of the verification process (see instructions). Item 12 is optional and is reported as of February 15.</i>		A. FREE ELIGIBLE based on FS/TANF/FDPIR Application (Categorically Eligible)	B. FREE ELIGIBLE based on Income/Household Size Application (Income Eligible)	C. REDUCED PRICE ELIGIBLE
7. No Change	# applications			
	# students			
8. Responded, Changed to Free	# applications			
	# students			
9. Responded, Changed to Reduced Price	# applications			
	# students			
10. Responded, Changed to Paid	# applications			
	# students			
11. Did Not Respond	# applications			
	# students			
12. Reapplied and Reapproved on or Before Feb. 15	# applications			
	# students			

Verification and the CRE

COORDINATED REVIEW EFFORT

GENERAL AREAS OF REVIEW

☐ SFA LEVEL
☐ SCHOOL LEVEL

SFA:

School:

REVIEW AREAS	YES	NO	N/A	COMMENTS
Free and Reduced Price Process				
501. Is the policy statement implemented as approved?				
502. Does the system as implemented (reviewer observation) prevent overt identification of students receiving free and reduced price benefits at meal service or at any other time?				
503a. Did the LEA establish the verification sample pool based on the total number of approved applications on file as of October 1?				
b. Were the applications subject to verification properly selected in accordance with the sample size option used?				
c. Were no more/no less than the percentage/maximum number of applications for the sample size option used selected for verification?				
504. If the LEA chose to replace applications selected for verification, was it done correctly and limited to 5% of the applications selected?				
505a. If required, did the LEA conduct confirmation reviews?				
b. Did the LEA follow the required procedures if the confirmation review did not validate the original determination?				
506. Were the households informed that acceptable documentation could be for any point in time between the month prior to application and the time the household is required to provide documentation?				
507. Did the LEA meet the follow-up requirements if the household failed to respond to the request for verification?				
508. Was verification completed by November 15 or was the LEA approved for an extension by the State agency?				
509a. Did the LEA attempt to directly verify selected applications?				
b. If YES, were the requirements met?				
510a. Was the verification process completed according to requirements?				

Update CRE
Review Instrument
– changes to the
review instrument
were highlighted

Verification –
General Areas of
Review

Initial
Determination –
PS 1

Verification and the CRE

- Type/Number on October 1
- Sample Size
- Error Prone (if required)
- No More, No Less
- Replacement Apps
- Confirmation Reviews
- Acceptable Documentation/Time Period
- Follow Up
- Verification Completion Date
- Direct Verification
- Completed According to Requirements

Verification and the CRE

- Tip for those using a technology based system that determines eligibility, and/or computes sample size, and/or selects applications:

Be sure that your system is accurate!

Type of Verification?

Number that System Selects for Verification?

Type of Applications Selected?

Verification

Questions?